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AIR QUALITY  
MANAGEMENT  
DISTRICT  
SINCE 1955**

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(Chair)  
Carol Klatt

**SANTA CLARA COUNTY**  
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Ken Yeager

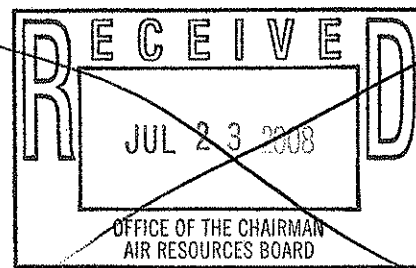
**SOLANO COUNTY**  
John F. Silva

**SONOMA COUNTY**  
Tim Smith  
Pamela Torliatt  
(Vice-Chair)

Jack P. Broadbent  
**EXECUTIVE OFFICER/APCO**

July 17, 2008

Chairperson Mary Nichols  
California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812



**Re: Proposed Regulation for Fuel Sulfur and Other Operational  
Requirements for Ocean-Going Vessels Within California Waters and 24  
Nautical Miles of the California Baseline**

Dear Chairperson Nichols:

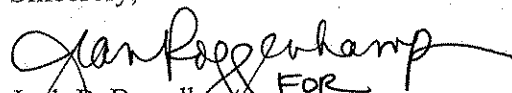
The Bay Area Air Quality Management District urges the Air Resources Board to adopt the proposed regulation to reduce particulate matter from propulsion and auxiliary diesel engines used by large ocean-going vessels while in port and within 24 nautical miles of California's shores. Emissions from large container vessels, oil tankers and cruise ships represent a significant source of diesel emissions within the San Francisco Bay, extending, as shown in the staff report, over a large part of the urban area in the Bay Area. The proposed regulation, through a switch in the type of fuel burned in the auxiliary and propulsion engines aboard the vessels, will significantly decrease Bay Area residents' exposure to harmful diesel particulates.

We support the regulation's requirement of a statewide marine fuel standard for all ocean-going vessels that visit California ports. The proposed provision that requires use of low-sulfur fuel out to 24 nautical miles will especially benefit the Bay Area since all vessels entering and transiting San Francisco Bay pass by densely populated communities. Requiring vessel operators to switch to low-sulfur fuel before entering the Bay will ensure the maximum achievable emission reductions that benefit public health.

The Air District has been working closely with the Port of Oakland and others to develop and implement an Air Quality Improvement Plan to reduce health risks from exposure to Port-related diesel particulate emissions by 85% in West Oakland by 2020. CARB staff recently completed a health risk assessment that showed that large ocean-going vessels contribute 60% of the cancer risk from Port activities in West Oakland. The use of fuel with low amounts of sulfur will immediately reduce diesel PM ship emissions and thus help the Port achieve its air quality goals and benefit the health of West Oakland residents.

Thank you for your consideration.

Sincerely,

  
Jack P. Broadbent  
Executive Officer/APCO

**ORIGINAL:**  
**Copies:**

Board Clerk  
Executive Officer  
Chair

cc: Supervisor Jerry Hill, Chair, BAAQMD

*Save the Air*